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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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<i>In re:</i>	:	
	:	Chapter 11
	:	
THE McCLATCHY COMPANY, <i>et al.</i>,	:	Case No. 20-10418 (MEW)
	:	
Debtors.¹	:	(Jointly Administered)
	:	
-----	X	Related to ECF No. 411

**CERTIFICATE OF NO OBJECTION REGARDING MOTION OF THE
OFFICIAL COMMITTEE OF UNSECURED CREDITORS FOR ENTRY OF
AN ORDER (I) CLARIFYING ITS DISCLOSURE OBLIGATIONS, (II) APPROVING
PROTOCOL FOR PROVIDING ACCESS TO INFORMATION TO UNSECURED
CREDITORS AND (III) RETAINING KURTZMAN CARSON CONSULTANTS LLC AS
INFORMATION AGENT, NUNC PRO TUNC TO APRIL 6, 2020**

Pursuant to Rule 9075-2 of the Local Bankruptcy Rules for the Southern District of New York (the “Local Bankruptcy Rules”), the undersigned hereby certifies as follows:

1. On May 4, 2020, the Official Committee of Unsecured Creditors in the above-captioned cases (the “Committee”) filed the *Notice of Presentment* (the “Notice”) and *Motion of the Official Committee of Unsecured Creditors for Entry of an Order (I) Clarifying Its*

¹ The last four digits of Debtor The McClatchy Company’s tax identification number are 0478. Due to the large number of debtor entities in these Chapter 11 Cases, which are being jointly administered, a complete list of the debtor entities and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <http://www.kccllc.net/McClatchy>. The location of the Debtors’ service address for purposes of these Chapter 11 Cases is: 2100 Q Street, Sacramento, California 95816.

Disclosure Obligations, (II) Approving Protocol for Providing Access to Information to Unsecured Creditors and (III) Retaining Kurtzman Carson Consultants LLC as Information Agent, Nunc Pro Tunc To April 6, 2020 (“Motion”) [ECF No. 411].

2. The deadline to object to the Motion was **May 11, 2020 at 4:00 p.m. (prevailing Eastern Time)** (the “Objection Deadline”). The Notice provides that the proposed order may be entered without a hearing if no objections or other responsive pleadings have been filed on or before the applicable objection deadline.

3. As of the filing of this certificate, over forty-eight (48) hours have elapsed since the Objection Deadline and, to the best of my knowledge, no responsive pleading to the Application has been (a) filed with the Court on the docket of the above-captioned chapter 11 cases or (b) served on the Committee or its counsel.

4. Accordingly, the Committee respectfully requests that the Court enter the proposed order granting the Motion, annexed to the Motion as **Exhibit A**. The proposed order has not been modified since the filing of the Motion.

Dated: May 13, 2020
New York, New York

Respectfully submitted,

STROOCK & STROOCK & LAVAN LLP

/s/ Kristopher M. Hansen

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